

# EXHIBIT Q

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

5 JAMES JIRAK and ROBERT )  
6 PEDERSEN, )  
7 )  
8 Plaintiffs, ) No. 07 C 3626  
9 )  
10 v. ) Judge Castillo  
11 )  
12 )  
13 ABBOTT LABORATORIES INC, ) Magistrate Judge  
14 )  
15 Defendant. ) Keys  
16 )

13 DEPOSITION OF MS. TERESA BODIE,  
14 produced, sworn, and examined on the part of the  
15 Defendant in an action pending in the United States  
16 District Court, Northern District of Illinois,  
17 Eastern Division, in the case of JAMES JIRAK and  
18 ROBERT PEDERSEN, Plaintiffs, versus ABBOTT  
19 LABORATORIES INC, Defendant, at 10:00 a.m. on  
20 Friday, August 14, 2009, at Embassy Suites, 11301  
21 Financial Center Parkway, Little Rock, Arkansas,  
22 before KAREN S. ROGERS, Registered Professional  
23 Reporter, Certified Realtime Reporter, Certified  
24 Court Reporter, and Notary Public in and for the  
25 State of Missouri.

1 So maybe who was the district manager you had for  
2 the longest, do you remember?

3 A. Probably Bill Naids.

4 Q. How do you spell his last name?

5 A. N-A-I-D-S.

6 Q. Do you remember how long he was your  
7 manager for?

8 A. A couple of years, two or three years.

9 Q. Do you remember which years?

10 A. Oh, 2002 is when he -- is when I  
11 acquired him. Probably 2002 to 2003 or '4. It was  
12 January of 2002 is when he started -- is when I was  
13 assigned to him.

14 Q. Can you give me a general description  
15 of your job duties as a pharmaceutical sales rep at  
16 Abbott?

17 A. It was to call on the doctors that were  
18 assigned to me and tell them about the products,  
19 educate them as to the products that I was  
20 representing and make sure they knew who it was for  
21 and how to prescribe it. Leave samples.

22 Q. What was the ultimate goal of educating  
23 the customer about Abbott's products?

24 MS. KATZENSTEIN: Objection. Misstates her  
25 testimony. She never called them a customer.

1 through everything before we ever saw it.

2 Q. Those lawyers are so annoying. We ruin  
3 everyone's fun.

4 A. They kept me paranoid about what I  
5 could say and couldn't say.

6 Q. That's what we do best, make people  
7 paranoid.

8 What was your understanding of what would  
9 happen if you said something that hadn't been  
10 approved by legal?

11 A. Grounds for dismissal or also  
12 prosecution. I'm telling you.

13 Q. That's not a good result. So did you  
14 think in your opinion that you performed well as a  
15 primary care rep at Abbott?

16 A. Yes.

17 Q. What do you think made you a good rep?

18 A. I think the fact that I do -- I am a  
19 friendly person. People get along with me well, so  
20 the doctors pretty much got along with me well. And  
21 their staff, which is just as important.

22 I did deliver the message I was supposed  
23 to. And they -- you know, they didn't hate to see  
24 me coming. Like there were some reps they  
25 wouldn't -- they didn't want to come in. And that's

1 you more and give you more time usually.

2 It had to -- it had to do with if we  
3 thought that we could influence them more just by  
4 repeating the message over and over.

5 Q. When you adjusted frequencies, did you  
6 have to get that approved by your manager?

7 A. Yes.

8 Q. What would happen if you adjusted  
9 frequencies and didn't tell your manager?

10 A. That's not possible.

11 Q. Why not?

12 A. Because he checks them all. He has  
13 access to everything.

14 Q. So when we're talking about changing  
15 your frequencies, are we talking about physically  
16 going into the system and changing the numbers?

17 A. Yes.

18 Q. Did you always follow the numbers that  
19 were on the system?

20 A. I tried to, yes.

21 Q. But if you didn't -- you know, if it  
22 said you had to call on one doctor five times and  
23 you only called on him four times, was there any way  
24 that your manager would know that?

25 A. Yes.